

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

<b>In the Matter of</b>	)	
	)	
<b>Revision of the Commission's Rules to</b>	)	<b>CC Docket 94-102</b>
<b>Ensure Compatibility with Enhanced 911</b>	)	
<b>Emergency Calling Systems</b>	)	

**To: Chief, Wireless Telecommunications Bureau**

**CENTENNIAL COMMUNICATIONS CORP.  
AMENDED REPORT ON E911 DEPLOYMENT REQUIREMENTS**

Centennial Communications Corp. ("Centennial"), by its attorneys and pursuant to Section 20.18(i) of the FCC's rules, and the *Fourth Memorandum Opinion and Order*<sup>1</sup> in this proceeding, hereby amends the Phase II E911 Implementation Plan submitted on November 9, 2000 ("November 9 Report") by its subsidiary Centennial Puerto Rico License Corp. ("Centennial License Corp.").<sup>2</sup> This amendment reflects a recent change in the Phase II E911 technology that Centennial now intends to deploy in its Caribbean markets.

In the November 9 report, Centennial advised the Commission that it intended to deploy the FINDS Position Determination Equipment hybrid solution being developed by Lucent Technologies. However, Centennial recently decided to switch from the Lucent hybrid solution

---

<sup>1</sup> *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket 94-102, Fourth Memorandum Opinion and Order, 15 FCC Rcd. 17442 (2000) ("*Fourth MO&O*").

<sup>2</sup> The November 9 Report was submitted erroneously under the name Centennial Puerto Rico Operations Corp. (Centennial Operations Corp.) Centennial Operations Corp. is also a subsidiary of Centennial and is also involved in the operation of Centennial's Puerto Rico market. However, Centennial License Corp. is the Centennial subsidiary that holds the B block broadband PCS license for the Puerto Rico/United States Virgin Islands MTA (MTA 25), and the name in which the original report should have been submitted.

to a network based solution offered by TruePosition, Inc. The decision to change Phase II E911 technologies was based primarily on economic factors, with Centennial being able to realize a significant cost savings by switching to a network based solution. In addition, since none of Centennial's handset vendors have yet made ALI-capable handsets available, which are also compatible with Centennial's CDMA network, switching Phase II solutions for purely economic reasons is justified. Furthermore, while Centennial has not yet been given definitive General Availability ("GA") dates by TruePosition, it is Centennial's understanding that TruePosition's network based solution is further along in development than many other solutions, and presumably, will be deployed sooner.

Centennial presently is in the process of conducting a trial and field testing of the TruePosition network solution in the San Juan metro area. Clearly, this testing will comply with the Empirical Testing Method outlined in the FCC's OET Bulletin No. 71. The remainder of the information submitted by Centennial in the November 9 Report remains accurate. In particular, to date, Centennial still has not received a PSAP request for Phase II implementation pursuant to Section 20.18(j) of the Commission's rules. Indeed, the single PSAP in the Puerto Rico market has indicated to Centennial that it has not yet focused on the Phase II E911 implementation issue. Consequently, Centennial is still unable to comment on PSAP interface issues.

Since Centennial License Corp is now deploying a network based solution in its Puerto Rico market, it is in compliance with Section 20.18 (f) of the rules. Centennial remains fully committed to timely complying with its Phase II obligations within six months of receiving a valid PSAP request, and with the changes outlined above, Centennial anticipates that it will be able to do so.

Centennial will continue to keep the Commission apprised of any significant developments that occur regarding its Phase II implementation in its Caribbean market.

Respectfully submitted,  
**Centennial Communications Corp.**

By: /s/ Theresa Z. Cavanaugh  
Theresa Zeterberg Cavanaugh  
**COLE, RAYWID & BRAVERMAN, LLP**  
1919 Pennsylvania Avenue, NW  
Second Floor  
Washington, DC 20006  
(202) 659-9750

September 26, 2001